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March 25, 2003

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Richardson Certification Filing for the
WHAT-COMM Communications Center 9-1-1 in Washington
WT Docket No. 03-76

Dear Ms. Dortch:

Pursuant to the City of Richardson **Reconsideration Order**,¹ enclosed is T-Mobile **USA, Inc.**'s certification with respect to the E911 request it has received from the WHAT-COMM Communications Center 9-1-1 in Washington.

Please contact me at 202-054-5900 with any questions or concerns

Sincerely,



Robert A. Calafi
Senior Corporate Counsel
Governmental and Industry Affairs

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Order on Reconsideration*, rel. Nov. 26, 2002 (City of Richardson Reconsideration Order).

No. of Copies rec'd 044
List ABOVE

CERTIFICATION OF TIM WONG

I, Tim Wong, certify:

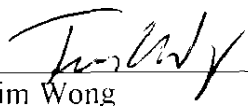
1. This certification is made on behalf of T-Mobile USA, Inc. ("T-Mobile") under Section 20.18(j)(4) of the Commission's rules, 47 C.F.R. § 20.18(j)(4).
2. I am Chief Technology Officer of T-Mobile. As Chief Technology Officer, I am responsible for and have general knowledge of T-Mobile's deployment of E-911 service. To the extent this certification discusses E911 deployment on the Public Safety Answer Point's ("PSAP") side of the demarcation point, those portions of this certification are based on T-Mobile's best understanding of those facts and circumstances, which is based largely on the representations of the PSAP and/or its Local Exchange Carrier ("LEC").
3. WHAT-COMM Communications Center 9-1-1, in Washington State, requested Phase I E911 service on 5/14/2002. More than six months have elapsed since the date of receipt of this request, and the deployment has not been completed.
4. To the best of my knowledge, the PSAP known as WHAT-COMM Communications Center 9-1-1 is currently not able to receive and utilize Phase I E911 data elements. I describe below the basis for this determination and reasons why further implementation efforts cannot be made until the PSAP becomes capable of receiving and utilizing the data elements associated with the E911 service requested.
 - (i) T-Mobile is implementing WHAT-COMM Communications Center 9-1-1's request for Phase I E911 service using non-call associated signaling (NCAS) and an E2 interface. WHAT-COMM Communications Center 9-1-1's ALI database – which is on the PSAP's side of the demarcation point – is currently not able to receive and utilize Phase I data elements transmitted using NCAS and an E2 interface.
 - (ii) Qwest is the 911 System Service Provider (SSP) for WHAT-COMM Communications Center 9-1-1 and provides the ALI database to the PSAP. Although Qwest has the technical capability to do so, and has now agreed to implement a change to its ALI database, it has not yet upgraded the ALI database interface in this manner so that WHAT-COMM Communications Center 9-1-1 would be capable of receiving Phase I E911 service using the E2 interface.
 - (iii) Until Qwest upgrades the ALI database, T-Mobile cannot complete Mobile Switching Center and Gateway Mobile Location Center data translations because, as a practical matter, these translations must be completed close in time to final deployment to avoid repeating the translations due to underlying network changes, or test the requested service, and WHAT-COMM Communications Center 9-1-1 will not be able to receive and utilize the E911 data elements transmitted by T-Mobile.
5. Listed in Attachment "A," attached hereto, are the specific steps T-Mobile has taken to provide the requested service to WHAT-COMM Communications Center 9-1-1, and the

specific steps that remain to be completed by T-Mobile. "Yes" means T-Mobile has completed that step. "Incapable" means T-Mobile cannot complete that step until the PSAP or LEC completes certain prerequisite steps, as described above. "N/A" means that the specific step is not applicable to the requested service in this instance (*i.e.*, it is a Phase I request and the specific step listed is Phase II only).

6. Listed in Attachment "B," attached hereto, are the specific steps that remain to be completed by the PSAP or other parties before T-Mobile can provide the E911 service requested. "Yes" means that, to the best of T-Mobile's understanding, the PSAP has completed that step. "No" means that, to the best of T-Mobile's understanding, the PSAP or other responsible party, has not completed that step. "N/A" means that the step is not applicable to the requested service in this instance. "Unknown" means that T-Mobile does not have sufficient knowledge to make any determination regarding the status of that step.
7. In accordance with Section 20.18(j)(4)(i) of the Commission's rules, on March 3, 2003, T-Mobile provided, by overnight, express delivery, written notice to WHAT-COMM Communications Center 9-1-1 of T-Mobile's intent to file this certification. WHAT-COMM Communications Center 9-1-1 did not respond to that notice.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on March 21, 2003, by:



Tim Wong
Chief Technology Officer

ATTACHMENT A to Certification of Tim Wong
Steps taken by T-Mobile toward E911 Implementation for WHAT-COMM
Communications Center 9-1-1

- | | |
|---|---|
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Built, tested, and integrated the Gateway Mobile Location Center ("GMLC") into T-Mobile's network |
| <input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A | Built, tested, and integrated the Serving Mobile Location Center ("SMLC") into T-Mobile's network (Phase II only) |
| <input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A | Built, tested, and integrated Location Measurement Unit(s) ("LMU") (Phase II, EOTD only) |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Upgraded, tested, and patched software in Mobile Switching Center(s) ("MSC") |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Upgraded, tested, and patched software in Base Station Controller(s) |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Requested selective router location (CLLI codes) from the PSAP or obtained location from an alternate source |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Sent coverage map(s) to the PSAP |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Sent data file(s) to the PSAP |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Requested routing instructions from the PSAP |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Prepared network design diagram |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Performed trunk sizing (<i>i.e.</i> , determined the number of trunks required) |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Completed forms and exhibits for ordering trunks from LEC |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Obtained PSAP authorization to order trunks, if applicable |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A | Ordered trunk(s) from LEC |

ATTACHMENT A

ATTACHMENT A to Certification of Tim Wong
Steps taken by T-Mobile toward E911 Implementation for WHAT-COMM
Communications Center 9-1-1

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Ordered transport from LEC, if applicable
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Tested trunks
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Requested pANI assignment from LEC or obtained from an alternate source
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Completed data file for delivery to PSAP
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Sent data file to PSAP
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Completed data file for delivery to ALI database provider
<input type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input checked="" type="checkbox"/> N/A	Sent data file to ALI database provider
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Performed MSC data translation (script allowing routing of E911 voice to correct PSAP and identification of the receiving tower)
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input type="checkbox"/> N/A	Performed GMLC data translation (script allowing routing of E911 data to correct PSAP and identification of the receiving tower)
<input type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input checked="" type="checkbox"/> N/A	Scheduled testing with PSAP
<input type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input checked="" type="checkbox"/> N/A	Performed profile test
<input type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input checked="" type="checkbox"/> N/A	Performed field test
<input type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input checked="" type="checkbox"/> N/A	Reconciled field test
<input type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input checked="" type="checkbox"/> N/A	Performed retest, if applicable
<input type="checkbox"/> Yes	<input type="checkbox"/> Incapable	<input checked="" type="checkbox"/> N/A	Accepted testing (provisioning complete)

ATTACHMENT A

ATTACHMENT B to Certification of Tim Wong
Actions Required By WHAT-COMM Communications Center 9-1-1 Or Other Parties
Before T-Mobile Can Complete E911 Implementation

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Unknown	Requested service from LEC (PSAP)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Unknown	Sent selective router location (CLLI codes) to T-Mobile (PSAP)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Unknown	Sent routing instructions to T-Mobile (PSAP)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Unknown	Upgraded Customer Premises Equipment ("CPE") (including Computer Aided Dispatch ("CAD"), Geographic Information System ("GIS"), and 10-digit capability) (PSAP)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Unknown	Built Master Street Address Guide ("MSAG") (PSAP)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Unknown	Completed data file upload (LEC)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Unknown	Upgraded ALI database, if applicable (LEC)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Unknown	Upgraded selective router, if applicable (LEC)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Unknown	Provisioned trunks for T-Mobile (LEC)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Unknown	Provisioned or upgraded trunks for PSAP (from Phase zero to Phase I or II), if applicable (LEC)

ATTACHMENT B